

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

MARNEY DURANJACOME,

Plaintiff,

v.

NATASHA JOYNES and RHONDA  
REYNOLDS,

Defendants.

C.A. No.: 06-186 JJF

NON-ARBITRATION CASE

JURY OF SIX DEMANDED

**DEFENDANT RHONDA REYNOLDS ANSWERS TO PLAINTIFF'S  
INTERROGATORIES**

1. Please identify yourself fully, giving your full name, age, residence address, business address and occupation, and if married, give the name of your husband or wife.

**ANSWER:**

**Name: Rhonda Nanette Reynolds**

**Age: 44**

**Address: 35 Parsons Lane, Georgetown, Delaware 19947**

**Occupation: Teacher; Jesus is Lord Church of Deliverance, Georgetown, Delaware.**

**Marital Status: Married**

**Spouse Name: William Reynolds**

2. Give the names and last known addresses of all persons who were present at the scene of the accident when the accident occurred, noting specifically those who were eyewitnesses.

**ANSWER:**

**Answering Defendant was not present at the scene of the accident.**

3. Give the names and last known addresses of all persons who were present at the scene of the accident within ten minutes after it occurred.

**ANSWER:**

**Answering Defendant was not present at the scene of the accident.**

4. Give the names and last known addresses of all persons other than those listed in the answers to Interrogatories 2 and 3 who have knowledge of the facts concerning how the accident occurred.

**ANSWER:**

**Employees of Nationwide Insurance Company and Defense Counsel.**

5. Give the names and last known addresses of all other persons who have knowledge of any facts alleged in the pleadings other than those persons given in the answers to Interrogatories 2, 3 and 4. Please set forth the number or numbers of the paragraph or paragraphs of the complaint or answer containing the facts of which the person has knowledge.

**ANSWER:**

**Upon information and belief, none.**

6. Give the names, last known addresses and telephone numbers of the persons from whom statements have been procured in regard to the facts alleged in the pleadings, and as to each such statement, state:

- (a) The name and last known address of the person who took the statement and the person from whom the statement was taken;
- (b) The date the statement was taken; and
- (c) The names and addresses of all persons who presently have copies of the statement.

**ANSWER:**

**Defense Counsel has in its possession a statement by Natasha Jones taken June 20, 2006. See attached.**

7. Give the name, address and telephone number of each person who has been interviewed on your behalf. As to each person interviewed, state:

- (a) The date of such interview;
- (b) The name and address of the person interviewed;
- (c) The name and last known address of each person who has a resume of such interview; and
- (d) A brief summary of the subject matter of the interview.

**ANSWER:**

**Upon information and belief, no one has been interviewed to date.**

8. Give the date(s) of any report, memorandum or resume prepared by you or anyone acting on your behalf but not necessarily limited to any investigator, insurance adjuster or other person pertaining to any of the facts alleged or referred to in the pleadings and as to each date given state:

- (a) The name and address of the person or persons who prepared such writing

and the name, address and identity of the employer of such person or persons;

(b) Whether such writing was prepared by you or on your behalf;

(c) The number of pages of such writing;

(d) A general description of such matter in writing (as, for instance, two-page typed summary of an interview between investigator Jones and witness Smith dated January 1, 1983, or five page report by investigator Smith concerning the results of his investigation of the facts of the accident, etc;

(e) Whether such writing was prepared under the supervision of or pursuant to the instructions of your attorney and, if so, the name and address of that attorney; and

(f) The names and addresses of persons who have copies of such matter in writing.

**ANSWER:**

**Objection as this question seeks to obtain information protected by the attorney-client and work product privileges. Subject to and without waiving said objection, no reports or the like have been prepared to date.**

9. Give the names and last known addresses of all persons who have taken photographs with regard to any fact alleged in the pleadings.

**ANSWER:**

**Defense Counsel has in its possession photocopies of photographs of what appears to be the accident scene. More specific information to be provided as the investigation is continuing.**

10. State whether or not any person was charged with the violation of any law as a result of this accident, and if the answer is in the affirmative, state:

(a) The name and address of the person charged;

(b) The nature of the charge;

(c) The statute citation; and

(d) The plea which was entered.

**ANSWER:**

**See police report.**

11. Have you ever been arrested for a traffic violation? If so, state:

(a) The nature of the charge;

(b) The statute citation; and

(c) The plea which was entered.

**ANSWER:**

**Not applicable.**

12. Identify the states in which you have had a license to operate a vehicle of the same type you were operating at the time of the accident and the dates during which

you have been so licensed.

**ANSWER:**

**Delaware.**

13. If you have ever had a license for the operation of any vehicle which contained any restrictions, state the nature of such restrictions and the dates when and places where such restrictions applied.

**ANSWER:**

**Not applicable.**

14. If you have ever had a license to operate any vehicle suspended, canceled or revoked, state the name of the state suspending, canceling or revoking such license, the inclusive dates of the suspension, cancellation or revocation of the license and the reasons therefore.

**ANSWER:**

**Not applicable.**

15. State in detail any mechanical defects which existed in the vehicle which you were operating at the time of the accident, giving also the name, address and telephone number of each individual who has such knowledge or information.

**ANSWER:**

**Upon information and belief, none. Answering Defendant reserves the right to supplement this response in accordance with the applicable Case Scheduling Order.**

16. Give a detailed account of all the damage suffered by your vehicle as a result of the collision described in the complaint.

**ANSWER:**

**See Damage Estimate in accompanying Responses to Request for Production.**

17. Give the name and addresses of all persons or firms who have made repairs to your vehicle for damages resulting from this accident.

**ANSWER:**

**To be provided.**

18. State in detail your destination and/or the purpose of your route of travel at the time of the accident, giving also the name, address, employer and address of the employer of each individual with knowledge or information with respect thereto. Further, include detailed information as to any and all stops you may have made en route, the reasons for such stops and the duration of such stops.

**ANSWER:**

**Not applicable.**

19. State the name, address and nature of the business of your employer at the time of the accident.

**ANSWER:**

**Jesus is Lord Church of Deliverance, 40 Ingram Road, Georgetown, Delaware.  
Religious institution.**

20. At the time of the accident were you acting in the course of the business of another or for any purposes of any other individual or entity?

**ANSWER:**

**Not applicable.**

21. At the time of the occurrence alleged in the complaint, did you have the full use of all extremities?

**ANSWER:**

**Not applicable.**

22. Do you now or did you ever wear a hearing aid?

**ANSWER:**

**Not applicable.**

23. Have you ever been a victim of or been treated for alcoholism or drug addiction?

**ANSWER:**

**Not applicable.**

24. If you have undergone any psychiatric or psychological examination or treatment within the last five years, give the name and address of the person or persons rendering such examination or treatment and a specific description of the nature of such examination or treatment.

**ANSWER:**

**Not applicable.**

25. Do you have 20/20 unimpaired vision without the use of corrective lenses?

**ANSWER:**

**Not applicable.**

26. With respect to each accident of any nature in which you were involved prior to or subsequent to the date of this accident, state the following:

- (a) The date of any such accident;
- (b) A general description of the accident; and
- (c) Whether or not a lawsuit arose from the accident.

**ANSWER:**

**Not applicable.**

27. State the name and address of every expert retained or employed by you in anticipation of this litigation or preparation for trial, whether or not you expect to call him

or her as a witness at trial, and, as to each, state:

- (a) The dates of initial employment;
- (b) The date or dates of any reports, letters or other writings prepared by such persons, brief description of such writing, and the names and addresses of persons having copies of them; and
- (c) Whether such expert also rendered any service in connection with any aspect of any subject matter of this litigation or preparation for trial.

**ANSWER:**

**No experts have been retained to date. Answering Defendant reserves the right to supplement this response in accordance with the applicable Case Scheduling Order.**

28. With respect to each expert, including but not limited to medical personnel, that you expect to call at trial to testify, state the following:

- (a) The subject matter on which the expert is expected to testify;
- (b) The substance of the facts and opinions to which the expert is expected to testify; and
- (c) A summary of the grounds for each such opinion;

**ANSWER:**

**See answer to interrogatory number 27.**

29. With respect to each piece of correspondence or report made by each expert identified in your answer to the preceding interrogatory concerning the facts and opinions as to which he is expected to testify, state the following:

- (a) The name of the expert writing such correspondence or report;
- (b) The date such correspondence or report was written; and
- (c) A summary of the new subject matter of such correspondence or report;

**ANSWER:**

**Not applicable.**

30. If you will do so without a request for production kindly attach to your answers to these interrogatories a copy of each piece of correspondence or report to

which you refer in your answer to the preceding interrogatory.

**ANSWER:**

**Not applicable.**

31. Please identify all reports, documents or things which have been or may be sent to any experts you have retained for this action.

**ANSWER:**

**Not applicable.**

32. State whether you or anyone on your behalf was written to or spoken with any doctors, hospitals, or other persons trained in the healing arts or written to or spoken with any person or company who maintains any records concerning injuries, illnesses, or the physical condition of the plaintiff. If the answer is yes, as to each request for information state:

- (a) The date such request was made;
- (b) The name and address of each person making such request;
- (c) The name and address of each doctor, hospital, etc., upon whom such request was made; and
- (d) The type of records, information, etc., requested;

**ANSWER:**

**None to date.**

33. State whether you or anyone on your behalf has received doctors' or hospital reports or records bearing on plaintiff's injuries. If the answer is "yes" state:

- (a) The name of each doctor, hospital, etc. issuing such reports or records;
- (b) The date(s) such reports or records were received by you or someone on your behalf; and
- (c) The subject matter of the reports or records received by you or by someone on your behalf;

**ANSWER:**

**Defense Counsel has in its possession copies of medical records which are available for review upon request.**

34. On the date of this accident, did you have a cellular telephone in your vehicle?

**ANSWER:**

**Not applicable.**

35. If so, please state:

- (a) The name of the cellular provider;
- (b) The address of the cellular provider;

- (c) The cellular telephone number;  
(d) Whether you used the cellular phone on the day of the accident;  
and  
(e) The name under which the billing was sent.

**ANSWER:**

**Not applicable.**

36. With respect to each affirmative defense set forth in defendant's answer, state:

- (a) The basis for such defense;  
(b) Whether the defense is waived.

**ANSWER:**

**To be provided.**

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Rhonda Reynolds

As to objections only:

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	)	C.A. No: 06-186
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	)	
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	)	
NATASHA JOYNES and RHONDA	)	JURY TRIAL DEMANDED
REYNOLDS,	)	
	)	
Defendants.	)	

**NOTICE OF SERVICE**

I certify that I have caused copies of the foregoing Answer to Interrogatories by Defendant Rhonda Reynolds to be served by e-filing on September 29, 2006 upon:

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